



81, Elkins Road
Port Hadlock, WA 98339
April 5, 2005

Ms. Marlene Dortch
Secretary Federal Communications Commission
445 12th St SW
Washington, DC 20554

Re: WT Docket 94-102

My name is Tracy Stringer. I am the Director of JeffCom 9-1-1 Communications, the PSAP for Jefferson County, Washington. Our center is located in Port Hadlock. Our population is approximately 28,000. Of those, 18,000 live in unincorporated areas. We currently have seven cell companies in our county.

Our county is very concerned about the accuracy levels provided by wireless companies. Jefferson County is very rural, so having a large measurement area makes it very difficult to locate a caller in an emergency.

Wireless 9-1-1 accuracy testing should be required at the local community level. Compliance testing should be conducted at the PSAP, not at the state or national level. Re-testing should be completed on either a yearly or biennial basis. Carriers should be held accountable for maintaining levels specified in the FCC's rules.

We need to take action and ensure proper coverage in all areas, not just in metropolitan areas. When we have a hiker call 9-1-1 in our county, we should have the same accuracy level for finding that person that a caller does in King County, at the Mall. When we have a victim of Domestic Violence dial 9-1-1 on her cell phone because she is hiding and can't use her wire line phone, we should be able to locate her. Accuracy levels must be consistent in each county.

The Commission should establish clear guidance regarding the relevant geographic area in which wireless carriers must provide and test E9-1-1 accuracy to the levels specified in the Commission's rules.

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Sincerely,
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